

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

KATHLEEN P. MULLINIX,)
Plaintiff,)
v.) Civil Action No. 04-12684-WGY
KIKI BOGORAD-GROSS and LEONARD P.)
BOGORAD, As They Are Executors of the Will of)
Lawrence Bogorad,)
Defendants.)
)

**PLAINTIFF'S ASSENTED-TO MOTION TO EXTEND TIME FOR FILING
OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

With the assent of the defendants, the plaintiff Kathleen P. Mullinix hereby moves the Court to allow her to file her opposition to the Defendants' Motion for Summary Judgment to and including June 19, 2006. Allowance of this assented-to motion will not alter any of the remaining deadlines established in the original case management scheduling order entered in this case.

As grounds for this assented-to motion, the plaintiff states as follows:

(i) The original case management scheduling order entered in this case on September 14, 2005 established the date of June 5, 2006 for the filing of dispositive motions. Accordingly, oppositions to dispositive motions filed on June 5, 2006 would need to be filed with the Court by June 19, 2006, the filing date the plaintiff seeks by this assented-to motion.

(ii) The defendants filed their Motion for Summary Judgment on May 25, 2006, and therefore the plaintiff's opposition to the defendants' motion would be due on June 8, 2006. However, due to the scheduled mediation of this case, the intervening Memorial Day holiday weekend, and the preparation for filing of the plaintiff's own motion for summary judgment (which will be filed with the Court

on June 5, 2006), the plaintiff needs the additional time requested in this assented-to motion to prepare her opposition to the Defendants' Motion for Summary Judgment.

(iii) Allowance of this assented-to motion will not alter any of the remaining deadlines established in the original case management scheduling order for the Final Pretrial Conference or Trial.

Respectfully submitted,

KATHLEEN P. MULLINIX,

By her attorneys,

/s/ Larry C. Kenna

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ASSENTED TO BY:

KIKI BOGORAD-GROSS and LEONARD P. BOGORAD, AS THEY ARE EXECUTORS OF THE WILL OF LAWRENCE BOGORAD

By their attorney,

/s/ Larry L. Varn

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Dated: June 2, 2006

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